UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

THE TAXIS FOR ALL CAMPAIGN, a nonprofit organization, DR. SIMI LINTON, an individual, UNITED SPINAL ASSOCIATION, a nonprofit organization, 504 DEMOCRATIC CLUB, a nonprofit organization, DISABLED IN ACTION, a nonprofit organization

Plaintiffs,

-against-

NEW YORK CITY TAXI AND LIMOUSINE COMMISSION, a charter mandated agency, MEERA JOSHI, in her official capacity as chairman and commissioner of the New York City Taxi and Limousine Commission, THE CITY OF NEW YORK, and BILL DE BLASIO, in his official capacity as Mayor of the City of New York

Defendants.

No. 11-cv-0237 (GBD)

NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF THE SETTLEMENT AGREEMENT

PLEASE TAKE NOTICE that upon the annexed declaration of Sid Wolinsky dated June 5, 2014, and the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of the Settlement Agreement, dated June 5, 2014, and upon all prior papers and proceedings herein, the undersigned will move this Court before the Honorable George B. Daniels at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for (i) Preliminary Approval of the proposed Class Action Settlement Stipulation (the "Agreement"), which has been filed herewith in the above-captioned matter; (ii)

an order approving the Class notice and order that the notice be distributed; and (iii) a scheduling order setting deadlines for objections and setting a Fairness Hearing.

Dated: June 5, 2014

New York, New York

Respectfully submitted,

DISABILITY RIGHTS ADVOCATES

Julia M. Pinover (JMP333)

DISABILITY RIGHTS ADVOCATES

40 Worth Street, Tenth Floor

New York, NY 10113

Tel: (212) 644-8644 Fax: (212) 644-8636 TTY: (877) 603-4579

Email: jpinover@dralegal.org

Sid Wolinsky (CA Bar No. 33716)*
Mary-Lee Smith (CA Bar No. 239086)*
Kara J. Janssen (CA Bar No. 274762)*
DISABILITY RIGHTS ADVOCATES
2001 Center Street, Fourth Floor
Berkeley, CA 94704

Tel: (510) 665-8655 Fax: (510) 665-8511 TTY: (510) 665-8716

Email: swolinsky@dralegal.org

* Admitted pro hac vice

Dan Brown, Esq.
Sarah Aberg, Esq.
Sheppard Mullin
30 Rockefeller Plaza, 39th Floor
New York, NY 10112

Telephone: (212) 634-3095 Facsimile: (212) 653-8701

Email: dlbrown@sheppardmullin.com

Attorneys for Plaintiffs